

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RILEY GAINES, et al.,

Plaintiffs,

v.

NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION, et al.,

Defendants.

Civil Action No.
1:24-cv-01109-MHC

**UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

State Defendants and Defendant NCAA (the “NCAA”) hereby move for a further extension of time to respond to Plaintiffs’ Complaint (Dkt. 1). Specifically, State Defendants and the NCAA request an extension through and including June 5, 2024. Plaintiffs do not object to this motion. In support of their joint motion, State Defendants and the NCAA state as follows:

1. On March 14, 2024, Plaintiffs filed their Complaint.
2. Plaintiffs’ Complaint is 156 pages long and contains 637 separately numbered paragraphs.
3. Due to the length of the Complaint, State Defendants and the NCAA requested an extension of time to answer or otherwise respond to Plaintiffs’ Complaint until May 6, 2024 (Dkt. 26).

4. On April 12, 2024, the Court granted the requests, extending the State Defendants and NCAA's deadline to respond to the Complaint until May 6, 2024 (Dkt. 27).

5. Since that extension, counsel for State Defendants have been working diligently to obtain consents to accept service from each of the individually named State Defendants, which has only recently been accomplished. However, due to the number of individual State Defendants named, getting all State Defendants to be able to review and approve a response to Plaintiff's Complaint has taken longer than it otherwise would in a case with fewer defendants.

6. An extension, however, will allow State Defendants' counsel to meet in person with many of the individual State Defendants at the May 14, 2024 Board of Regents meeting to review and discuss the response to the Complaint.

7. Due to the length of the Complaint, the number of State Defendants served, the logistical challenges in communicating with and receiving the consent of so many Defendants, the upcoming May 14, 2024 Board of Regents meeting, and the sensitive issues involved, State Defendants request additional time to review and respond to Plaintiffs' Complaint.

8. The NCAA joins this motion to allow all parties and the Court to benefit from a single set of deadlines.

9. Pursuant to the Court's standing order, State Defendants and the

NCAA's counsel have conferred with Plaintiffs' counsel. Plaintiffs have authorized the movants to state that this request for a second extension is unopposed.

10. Granting an extension will not prejudice any party nor substantively delay the case, as the Court has not yet entered a scheduling order. Allowing State Defendants and the NCAA's counsel the time needed to review and respond to Plaintiffs' Complaint in a deliberative manner will provide the Court with the best response possible of these important issues without materially affecting the administration of the case.

11. For these reasons, good cause for an extension of time exists and State Defendants and the NCAA respectfully request that the Court extend their deadline to answer or otherwise respond to Plaintiffs' Complaint through and including June 5, 2024.

12. A proposed order is attached.

Respectfully submitted this 3rd day of May, 2024.

/s/ Cari K. Dawson
 Cari K. Dawson
 Georgia Bar No. 213490
 cari.dawson@alston.com
 Christopher C. Marquardt
 Georgia Bar No. 471150
 chris.marquardt@alston.com
 John E. Stephenson
 Georgia Bar No. 679825
 john.stephenson@alston.com

/s/ Javier I. Pico Prats
 Josh B. Belinfante 047399
 Vincent R. Russo 242628
 Edward A. Bedard 926148
 Javier I. Pico Prats 664717
 Anna E. Edmondson 289667
 ROBBINS ALLOY BELINFANTE
 LITTLEFIELD, LLC
 500 14th St. NW
 Atlanta, GA 30318

One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309
Phone: (404) 881-7000
Fax: (404) 881-7777

*Counsel for Defendant National
Collegiate Athletic Association*

T: 678-701-9381
E: jbelinfante@robbinsfirm.com
vrusso@robbinsfirm.com
ebedard@robbinsfirm.com
jpicooprats@robbinsfirm.com
aedmondson@robbinsfirm.com

Counsel for State Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RILEY GAINES, et al.,

Plaintiffs,

v.

NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION, et al.,

Defendants.

Civil Action No.
1:24-cv-01109-MHC

CERTIFICATE OF COMPLIANCE

I hereby certify, pursuant to Local Rule 5.1 and 7.1D, that the foregoing motion has been prepared using Times New Roman, 14-point font.

Respectfully submitted this 3rd day of May, 2024.

/s/ Javier I. Pico Prats

Javier I. Pico Prats

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RILEY GAINES, et al.,

Plaintiffs,

v.

NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION, et al.,

Defendants.

Civil Action No.
1:24-cv-01109-MHC

CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed the foregoing UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT with the Clerk of Court using the CM/ECF system, which will serve a notice to all counsel.

This 3rd day of May, 2024.

/s/ Javier I. Pico Prats

Javier I. Pico Prats